

REMARKS

Claims 1-96 are pending in the application.

Claims 1-96 stand rejected.

Rejection of Claims under 35 U.S.C. §102

Claims 1-96 stand rejected under 35 U.S.C. §102(b) as being anticipated by Farrand et al., U.S. Patent No. 5,309,563 (Farrand). Applicant respectfully traverses this rejection.

As an initial matter, Applicant respectfully submits that the pertinence of the cited reference that the Examiner has relied upon to reject claim 1 has not been clearly explained as required by 37 C.F.R. §1.104(c)(2). The Office Action references column 2, lines 55-65 of Farrand and suggests that Farrand teaches therein “a message, wherein said message comprises customer relations management system information.” (Office Action, page 2). The Office Action does not clearly explain, and it is not apparent, which element of Farrand’s system anticipates the message claimed in claim 1. Nevertheless, Applicant has made every attempt to respond to the rejections recited in the Office Action.

Applicant respectfully submits that Farrand does not teach each element of claim 1. Claim 1 claims “an inter-module communication comprising: a message, wherein said message comprises customer relations management system information.” The “customer relations management system information” of claim 1 is information associated with a customer relations management system. In the portion of Farrand’s disclosure cited by the Office Action, Farrand does not disclose any communication of information related to a customer relations management system. Column 2, lines 55-65 Farrand states: “the invention relates to a protocol for local data transfers between a system manager for a computer system and a network operating system associated with the computer system and a method for exchanging command and response

messages between the system manager and the network operating system using a bus master interface provided between the two. The bus master interface includes a pair of doorbell registers, a semaphore register and a mailbox register for transferring command and command responses between the system manager and the network operating system.”

As an initial matter, Applicant respectfully notes that Farrand has nothing whatsoever to do with any customer relations management system, as recited in claim 1, for example. Farrand is concerned with a computer-implemented method for transferring command messages between a system manager for a computer system and an associated network operating system. By contrast, and as noted, the claimed invention is directed to an inter-module communication that comprises a “message compris[ing] customer relations management system information” No such customer relations management system information is disclosed in Farrand, because the invention disclosed in Farrand is not related to customer relations management systems.

In fact, Applicant is unable to identify (and the Office Action fails to specify) any part of the foregoing citation that teaches a “message compris[ing] customer relations management system information,” as claimed in claim 1. However, in order to respond to the Office Action, Applicant respectfully submits that a message comprising customer relations management system information is distinguished over each element described in the cited portion of Farrand. These elements include the “local data transfers,” the “commands” and the “command responses,” which are the only elements in Farrand’s disclosure that might even be remotely comparable to a message such as the claimed message (and which Applicants respectfully maintain are not, in fact).

First, Applicant submits that Farrand’s “local data transfers” fail to show, teach or suggest a “message compris[ing] customer relations management system information,” as recited in claim 1. Applicant notes that the local data transferred by Farrand’s protocol is data in the

form of alert signals, commands and command responses. (column 13, line 54 to column 14, line 57). The alert signals report errors such as catastrophic board failure, software errors, overrun errors and other such errors (column 5, line 39 to column 6, line 57. Thus, the alert signals do not communicate information associated with a customer relations management system.

Applicant also submits that Farrand's "commands" do not show, teach or suggest a "message compris[ing] customer relations management system information." As stated in Column 16, lines 22-31 of Farrand, "most commands to the system manager act on objects," Examples of these commands are found in columns 19 –22 of Farrand's disclosure and include: Create Object, Modify Object, Delete Object, Get Available Object Space, Get Number of Objects, Get All Objects, Get Objects by Class, Get Classes, Get Object Log, Modify Object Attributes, Delete Object Attributes, Get Object Attributes, Send Attribute Update, Alert, Get Alert Log, Get Feature Settings. Applicant notes that Farrand's "commands" manipulate objects, classes, attributes and settings, but do not convey customer relations management system information. Thus, Farrand's "commands" fail to anticipate a "message compris[ing] customer relations management system information," as claimed in claim 1, for at least the reason that they do not communicate information associated with a customer relations management system.

Finally, Applicant submits that Farrand's "command responses" do not show, teach or suggest a "message compris[ing] customer relations management system information." With respect to the command responses, Farrand states: "The command responses include possible errors to be returned upon command completion are listed collectively later in the specification. Specifically, the return codes for each command consists of the possible errors listed for the specific command codes in the appendices set forth below." (column 18, lines 61-67). The "command responses" disclosed by Farrand are error codes, and are not related to customer

relations management system information. Therefore, Farrand's "command responses" fail to anticipate a "message compris[ing] customer relations management system information," as claimed in claim 1, for at least the reason that they do not communicate information associated with a customer relations management system.

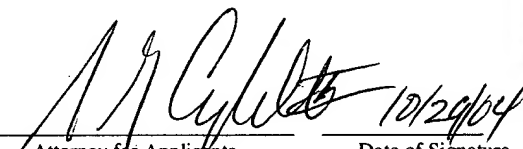
As is evident, Farrand fails to anticipate the claimed message. This is because Farrand does not disclose information regarding a customer relations management system. Farrand fails to disclose information regarding a customer relations management system because Farrand has nothing to do with a customer relations management system, as noted previously. Farrand seeks to "improve the capability of the system manager to readily exchange information with the network operating system, thereby providing improved ability of the system manager to utilize the network in management operations as well as to provide for the capability of the system manager to generate alerts for the network." (column 2, lines 42-52). Thus, Farrand does not (and could not be expected to) disclose information related to a customer relations management system.

Applicant therefore respectfully submits that claim 1 clearly distinguishes over Farrand. Applicant submits that these arguments apply with equal force to independent claims 12, 23, 37, 46, 55, 65, 73, 81 and 89. Applicant therefore respectfully submits that independent claims 1, 12, 23, 37, 46, 55, 65, 73, 81 and 89, as well as claims 2-11, 13-22, 24-36, 38-45, 47-54, 56-64, 66-72, 74-80, 82-88 and 90-96 which depend on claims 1, 12, 23, 37, 46, 55, 65, 73, 81 and 89, are allowable for at least the foregoing reasons. Applicant therefore respectfully requests withdrawal of the rejections based upon 35 U.S.C. §102(b). Accordingly, Applicant respectfully submits that claims 1-96 are in condition for allowance.

CONCLUSION

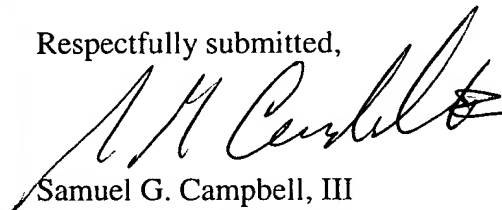
In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5084.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on **October 29, 2004**.


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12/29/04
Date of Signature

Respectfully submitted,



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